

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

ELYSE MCKENNA,

Plaintiff,

v.

Case No: 24-cv-12347

Hon. Judge Brandy R. McMillion

ROBERT F. RILEY, *an individual*,
RILEY & HURLEY, P.C. *a domestic*
professional corporation,
OLSMAN, MACKENZIE,
PEACOCK, P.C. *a domestic professional*
corporation,
Defendants.

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AFFIDAVIT OF TERESA D' COSTA

STATE OF MICHIGAN)

) SS:

COUNTY OF OAKLAND)

I, Teresa D' Costa, first being duly sworn on oath, state as follows:

1. I am an administrative legal assistant at Deborah Gordon Law.
2. I have no knowledge of a call from Elyse McKenna on February 5, 2024.
3. On February 6, 2024 a call came in to the office from Elyse McKenna, which I answered.

4. When I answered Ms. McKenna's call on February 6, 2024, I performed our intake process, in which I ask the caller the following questions: Caller's full name, phone number, email address, employer name, title held at the company, how long have they been at the company, if they are currently employed, salary, and a brief description of their situation, for example, whether an employment action has been taken against the caller, and what they believe the reason is.

5. Our intake process is designed to be brief, provide basic information, and avoid discussion of irrelevant information, including a caller's thoughts, feelings, and other irrelevant details.

6. The notes that I took summarizing the information I obtained from McKenna during the February 6, 2024 call are attached as Ex. 2.

7. I do not recall learning any facts or information during the February 6, 2024 call that are not contained in my notes. Ex. 2.

8. In particular, McKenna did not tell me she had already retained legal counsel to represent her. This would have been important information as part of intake.

9. I did not give Ms. McKenna legal advice of any kind, as I am not an attorney and have no prior legal background.

FURTHER DECLARANT SAYETH NOT.

 3/26/25

Teresa D' Costa

DORA R KOSKI
NOTARY PUBLIC - STATE OF MICHIGAN
COUNTY OF OAKLAND
My Commission Expires May 29, 2031
Acting in the County of Oakland

 3/26/25